

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matter of E.Q.)	
)	
ARBEN QOSJA)	
)	
Petitioner,)	
)	
vs.)	No. 1:25-cv-02995
)	
SAFETE KRASNIQI)	
)	
Respondent.)	
)	

The Convention on the Civil Aspects of International Child Abduction, done at The Hague on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 *et seq.*

Before the Court is the Verified Petition for the Return of the Child to England (the “Petition”) [ECF No. 1]. This Order addresses the Petitioner’s Motion to Expedite Proceedings and Issuance of Show Cause Order, including Temporary Restraining Order, Preliminary Injunction, and Expedited Scheduling Order. Upon considering the Petition for Return, the Motion to Expedite and for an Issuance of an Immediate Show Cause Order, the Hague Convention, and ICARA, it is this ___ day of April, 2025:

ORDERED that Respondent, Safete Krasniqui, or her attorneys, show cause before this Court, at the United States Courthouse, United States District Court for the Southern District of New York, located at 40 Foley Square, New York 10007 on the ___ day of ____, 2025 at ___ o’clock in the ____ thereof, or as soon thereafter as counsel can be heard, why an order should not be made and entered granting the Petitioner the following relief:

- a. Pursuant to Article 11 of the Hague Convention on the Civil Aspects of International Child Abduction, setting an expedited hearing on the Petition and communicating that hearing date and time to Petitioner so that Petitioner may provide notice of these proceedings and the hearing to Respondent pursuant to 22 U.S.C. § 9003(c); and

- b. Issue an order following the hearing, directing that E.Q. (the “Child”) shall be returned to Petitioner, pursuant to Articles 1(a) and 12 of the Hague Convention on the Civil Aspects of International Child Abduction and Section 4(b) of the International Child Abduction Remedies Act (“ICARA”), 22 U.S.C. § 9003(b); and
- c. Issue an immediate order prohibiting the removal of the Child from the jurisdiction of this Court, pending a hearing on the merits of the Verified Petition; and
- d. Issue an immediate order that Respondent surrender any and all of her passports and all of the passports of the Child; and
- e. Issue an order directing Respondent to pay Petitioner for all costs and fees incurred to date by reason of the Child’s wrongful removal and retention pursuant to 22 U.S.C. § 9007(b)(3) and the Hague Convention, Article 26; and
- f. Any such further relief as justice and its cause may require; and it is further

ORDERED that pending the hearing and determination of this application and the entry of an Order thereon, the Respondent, or any person acting in concert or participation with Respondent, is prohibited from removing the Child, E.Q., born in 2015, from the state of New York; and it is further

ORDERED that pending the hearing and determination of this application and the entry of an Order thereon, Respondent shall immediately deposit with the Clerk of the Court any and all passports or other travel documents in the name of E.Q., which shall be held for safekeeping by the Court; and it is further

ORDERED that the United States Marshals Service shall proceed to Respondent’s residence, retrieve any and all passports of the subject Child, E.Q., and deliver them to the Clerk of Court for safekeeping pending the resolution of this proceeding. Respondent’s address is located at 2040 Bronxdale Ave, Apt 1B, Bronx NY 10462.

IT IS SO ORDERED.

Dated this ____ day of _____, 2025

Hon. Judge J. Paul Oetken